Title:

Forename:

**Representing:** 

**Organisation (if applicable):** 

Email:

## What do you want Ofcom to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

#### Ofcom may publish a response summary:

Yes

#### I confirm that I have read the declaration:

Yes

## Of com should only publish this response after the consultation has ended:

You may publish my response on receipt

#### **Additional comments:**

Question 1: Do you agree that Ofcom should limit the number of times a company can call an answer machine without guaranteeing the presence of a live operator to once every 24 hours?:

No

#### Question 2: Do you agree with Ofcom that a two month implementation period (from publication of Ofcom's revised statement) would be an appropriate length of time for industry stakeholders to adopt any changes to comply with the proposed 24 hour policy?:

No, 6 months would be more manageable in view of the work and implications involved in making changes

# **Question 3: Has Ofcom provided sufficient clarity on how the abandoned call rate is to be calculated?:**

No, wording is ambiguous and the DMA document is clearer

# Question 4: Do you agree with the factors set out by Ofcom for determining a reasoned estimate of AMD false positives in an ACS user's abandoned call rate?:

No. Ofcom should provide more guidance and a test in order to compare apples with apples

Question 5: Has Ofcom provided sufficient clarity on how AMD users should calculate an abandoned call rate that includes a reasoned estimate of AMD false positives?:

No, as above

Question 6: Has Ofcom provided sufficient clarity on how non-AMD users should calculate an abandoned call rate that includes an estimate of abandoned calls picked up by answer machines? :

No, as above

Question 7: Do you agree that Ofcom should not amend the existing two second policy as set out in the 2009 Amendment from 'start of salutation' to 'end of salutation'?:

No, this should be amended to emnd of salutation

Question 8: Do you agree with Ofcom's policy proposal that companies provide a geographic contact number (01, 02 or 03) in addition to a freephone (080) number in the information message provided in the event of an abandoned call?:

Yes

**Question 9: Has Ofcom provided sufficient clarity on what constitutes a 'campaign'?:** 

No